

In The United States District Court
For The District Of Delaware

William Joseph Webb Jr.,
Plaintiff,

v.

First Correctional Medical,
Et. Al.,
Defendants.

Civ. Act. No. : 07-31-GMS

Jury Trial Requested



Plaintiff's Response For State Defendants' Request For
Production Of Documents And Things Directed
To Plaintiff.

Request No. 1: 1. All grievances, complaints, or other correspondence relating to, regarding or arising out of the incidents alleged in Plaintiff's Complaint, including, but not limited to, all grievances or complaints submitted by Plaintiff to D.O.C. personnel, responses thereto, and any related

correspondence between Plaintiff and D.O.C. personnel.

Response to Request No. 1: Defendant Stan Taylor has provided this also, a copy of said materials were forwarded with Plaintiff's Responses to CMS', Ar. Nigz's and Gina Wolken's Request for documents. Also, some correspondence is still in the possession of D.O.C. Staff and other unidentifiable people at this time which will be made as discovery continues.

Request No. 2: 2. All correspondence relating to, regarding or arising out of the incidents alleged in Plaintiff's Complaint, including, but not limited to, any correspondence between friends or family members of Plaintiff or other inmates and D.O.C. personnel.

Response to Request No. 2: You can contact Jesh Deiner at Legislative Hall or Elizabeth Webb at 34 Herbert Drive New Castle, DE 19720, also some correspondence is still in the possession of D.O.C. and other sources.

Request No. 3: 3. Any statements, declarations, petitions, or affidavits relating to, regarding or arising out of the incidents alleged in Plaintiff's Complaint and any statements, declarations, or affidavits of Plaintiff, other inmates, or witnesses to the allegations in the Complaint.
Response to Request No. 3: These will be provided later, where Plaintiff is seeking these articles and documents from the appropriate people.

Request No. 4: 4. All criminal history records for Plaintiff from any other State besides Delaware for the past 15 years.

Response to Request No. 4: There are none.

Request No. 5: 5. All medical records for Plaintiff relating to, regarding or arising out of the incidents alleged in Plaintiff's Complaint.

Response to Request No. 5: CMS is refusing to make discovery.

Request No. 6: 6. All medical records for Plaintiff for the past 15 years.

Response to Request No. 6: CMS, Dr. Nizz's, and Gina Wolken's attorney is in the process of obtaining these records, which will be made available as soon as possible.

Request No. 7: 7. Any and all document(s) referenced or identified in Plaintiff's Responses to Interrogatories served contemporaneously herewith.

Response to Request No. 7: Some have been produced, some are in the possession of D.O.C. personnel, and any outstanding documents will be produced as discovery continues.

Dated: January 15, 2008

Respectfully,

William Joseph Webb Jr.
William Joseph Webb Jr.

#0256056 / 17 S.H.V. C12L

1181 Paddock Road

Smyrna, DE 19977

Certificate of Service

I, William Joseph Webb Jr. hereby certify that I have served true and correct copies of the attached Response to Discovery by State Def.'s directed to Plaintiff upon the following:

To: Catherine Damavandi, Esq.

820 North French Street

Wilmington, DE 19801

To: Ryan M. Ernst, Eileen M. Ford,
and Megan T. Mantzavinos Esqs.

913 Market Street

Suite 800

Wilmington, DE 19801

By placing same in the mailbox of the U.S. Postal Office at
D.C.C. Smyrna, DE on this 15th day of January, 2008,

William Joseph Webb Jr.

William Joseph Webb Jr.

2100 5150310951



I/M William Joseph Webb Jr.
SBI# 00256056 UNIT 17 SHV C12L
DELAWARE CORRECTIONAL CENTER
1181 PADDOCK ROAD
SMYRNA, DELAWARE 19977

Clerk of the U.S. District Court for Delaware
844 King Street
Lock box 18
Wilmington, DE
19801